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June 20, 2025

VIA ECF

Hon. Gary Stein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 9A
New York, NY 10007

Re: *Northwest Biotherapeutics, Inc. v. Canaccord Genuity LLC, et al.*,
No. 1:22-cv-10185-GHW-GS

Dear Magistrate Judge Stein:

Plaintiff Northwest Biotherapeutics Inc. (“NWBO”) and all Defendants¹ (together, the “Parties”) submit this joint status letter pursuant to the Case Management Plan and Scheduling Order (“Case Management Plan”). ECF No. 218 at 5.

Since the June 5, 2025 Initial Case Management Conference, the Parties have continued to make progress in discovery. Pursuant to the Case Management Plan, the Parties exchanged initial disclosures on June 9, 2025. NWBO has served a first set of Requests for Production (“RFPs”) on each Defendant, to which each Defendant has served or will soon serve responses and objections (“R&Os”). Defendants have served first sets of RFPs on NWBO,² and Citadel Securities LLC has also served a first set of interrogatories on NWBO, to which NWBO has served R&Os. On June 16, 2025, pursuant to the Case Management Plan (ECF No. 218 at 4), the Parties submitted competing proposals for both the Protective Order and ESI Protocol to govern this action. *See* ECF Nos. 219, 220. The Parties’ disputes as to the Protective Order and ESI Protocol remain pending. At this time, there are no other ripe discovery disputes or other issues that the Parties wish to raise.

¹ Defendants are Canaccord Genuity LLC, Citadel Securities LLC, G1 Execution Services LLC, GTS Securities LLC, Instinet LLC, Lime Trading Corp., and Virtu Americas LLC.

² On May 9, 2025, Citadel Securities LLC served RFPs on NWBO, to which NWBO served R&Os on June 9, 2025. Other Defendants served RFPs on NWBO on June 12, 2025, with the exception of Lime Trading Corp., which is resting on the RFPs served by other Defendants. NWBO will serve R&Os to these RFPs on July 14, 2025.

Respectfully submitted,

/s/ Laura H. Posner (with permission)

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